

BRENDAN M. KUNKLE (SBN 173292) bkunkle@abbeylaw.com

MICHAEL D. GREEN (SBN 214142) mgreen@abbeylaw.com

**ABBEY, WEITZENBERG, WARREN & EMERY, P.C.**

100 Stony Point Road, Suite 200

Santa Rosa, CA 95401

Telephone: 707-542-5050

Facsimile: 707-542-2589

*Attorneys for Fire Victim Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

-and-

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**NOTICE OF MOTION TO ALLOW/DEEM  
TIMELY LATE FILING OF PROOFS OF  
CLAIM**

Date: January 12, 2021

Time: 10:00 a.m.

Dept: Telephonic/Video Appearances Only

United States Bankruptcy Court

450 Golden Gate Ave.

Courtroom 17, 16th Floor, San Francisco, CA

Judge: Hon. Dennis Montali

Objection Deadline: January 5, 2021

PLEASE TAKE NOTICE that the Bankruptcy Court will hear and consider the Motion to Allow/Deem Timely Late Filing of Proof of Claim by Movants listed on Exhibit A attached hereto, on January 12, 2021 at 10:00 a.m. (Pacific Time) ("Movants' Late Claim Motion") via video conferencing or telephone.

All interested parties should consult the Bankruptcy Court's website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information about court operations during the COVID-19 pandemic. The Bankruptcy Court's website provides information regarding how to arrange a telephonic or video appearance. If you have any questions regarding how to appear at a court

1 hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live  
2 Chat feature on the Bankruptcy Court's website.

3 PLEASE TAKE FURTHER NOTICE that the deadline to object to the Movants' Late  
4 Claim Motion is January 5, 2021.

5 PLEASE TAKE FURTHER NOTICE that copies of the Movants' Late Claim Motion can  
6 be viewed and obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (ii)  
7 by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA  
8 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC,  
9 at <http://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based  
10 parties; or +1 (929) 333-8977 for international parties or by e-mail at: [pginfo@primeclerk.com](mailto:pginfo@primeclerk.com).

11 Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

12  
13 DATED: December 11, 2020

**ABBEY, WEITZENBERG, WARREN & EMERY PC**

14  
15 By: /s/ Brendan M. Kunkle  
16 BRENDAN M. KUNKLE (SBN 173292)  
17 **ABBEY, WEITZENBERG, WARREN &**  
18 **EMERY PC**  
19 100 Stony Point Road, Suite 200  
20 Santa Rosa, CA 95401  
21 Telephone: 707-542-5050  
22 Facsimile: 707-542-2589  
23 bkunkle@abbeylaw.com  
24 *Attorneys for Numerous Fire Claimants*  
25  
26  
27  
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

*/s/ Brendan M. Kunkle*  
Brendan M. Kunkle

# EXHIBIT A

## LIST OF MOVANTS

1. Burchfield, Lisa  
3614 Coffey Lane  
Santa Rosa, CA 95403  
Date of Birth: May 17, 1982  
Parents: Douglas and Vickie Pettit  
Nature of Claim: Personal property destroyed.
2. Burchfield, Madison  
3614 Coffey Lane  
Santa Rosa, CA 95403  
Date of Birth: January 3, 2005  
Parent: Lisa Burchfield  
Nature of Claim: Personal property destroyed.
3. East, Daniel  
3614 Coffey Lane  
Santa Rosa, CA 95403  
Date of Birth: October 16, 2007  
Parent: Lisa Burchfield  
Nature of Claim: Personal property destroyed.
4. Olson, Cory  
3739 Lakebriar Place  
Santa Rosa, CA 95403  
Date of Birth: February 6, 2000  
Parents: Gary and Lisa Olson  
Nature of Claim: Evacuated and personal property destroyed.
5. Olson, Kylie  
3729 Lakebriar Place  
Santa Rosa, CA 95403  
Date of Birth: February 6, 2000  
Parents: Gary and Lisa Olson  
Nature of Claim: Evacuated and personal property destroyed.
6. Perry, Samantha  
2855 Rollo Road  
Santa Rosa, CA 95404  
Date of Birth: July 25, 1997  
Parents: Michael and Elysa Perry  
Nature of Claim: Personal property destroyed.

- 1 7. Reese, Cambria  
2 5262 Vista Grande Drive  
3 Santa Rosa, CA 95403  
4 Date of Birth: September 7, 1992  
5 Parents: Daryl and Janice Reese  
6 Nature of Claim: Personal property destroyed.  
7  
8 8. Shepperd, David  
9 1935 Lyon Court  
10 Santa Rosa, CA 95403  
11 Date of Birth: November 10, 1994  
12 Parents: Charles and Anne Shepperd  
13 Nature of Claim: Personal property destroyed.  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28